Montana Department of
ENVIRONMENTAL QUALITY

Brian Schweitzer, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • www.deq.mt.gov

May 10, 2006

COPY

Mr. Jon Nickel
Asarco Inc.
East Helena Plant
P.O. Box 1230
East Helena, MT 59635

Subject: May 5, 2006, Compliance Evaluation Inspection - Asarco East Helena Plant

Dear Mr. Nickel:

Enclosed is my inspection report and digital photographs taken of Asarco's #1 Blast Furnace Flue, Dross Plant, Sinter Plant, and the Bailey and CSHB buildings during the Department's compliance inspection at Asarco's East Helena facility. Please review this report and enclosed documents carefully.

I want to thank you for the time spent during our inspection. If you have any questions or need further assistance, please feel free to contact me at (406) 444-5852, or e-mail me at ijohnson@mt.gov.

Sincerely,

Iver L. Johnson
HW Specialist
WUTM Bureau

Enclosure(s) Field Investigation Report with Photolog

cc: Ms. Linda Jacobson, EPA Region 8, 999 18th Street, Suite 500,
Denver, CO 80202-2466

MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Waste & Underground Tank Management Bureau

FIELD INVESTIGATION REPORT

SITE: Asarco - East Helena Plant

EPA ID # MTD006230346

LOCATION: East Helena

DATES & TIMES: May 5, 2006 @ 1:30 pm

INSPECTION LENGTH: 2 Hours 15 Minutes

CONTACT: Jon Nickel, Asarco Representative

INSPECTION TEAM: Iver L. Johnson, DEQ

PURPOSE: Compliance Evaluation Inspections

REPORT PREPARED BY: Iver L. Johnson

BACKGROUND: The purpose of this evaluation was to inspect and confirm the structural integrity at the #1 Blast Furnace Flue, observe demolition activities at the Sinter Plant, inspect Asbestos Containing Material (ACM) interim storage in the Bailey building and inspect the Corrective Action Management Unit (CAMU) waste stored in the Consolidated Storage & Handling Building (CSHB) in accordance with Asarco's Site Work Plan dated February 2006.

The information gathered will be useful to the Department in monitoring Asarco's continuing goal to remove, store, and properly dispose or recycle all remaining hazardous wastes and recyclable materials from identified process units located within Asarco's East Helena Plant. Mr. Johnson arranged with Mr. Nickel to conduct this inspection on this date and time.

RESULTS OF THE INSPECTION: Upon arrival at the East Helena facility, I met with Mr. Nickel in his office. I informed him of the purpose of my inspection. I told him that I wanted to look and photograph the Blast Furnace ventilation flue floor behind the Blast Furnace building and observe/inspect and photograph the demolition activities at the Sinter Plant to include interim waste storage at the Bailey building and CSHB.

Prior to the physical inspection of the process units, I discussed with Mr. Nickel the issue about segregating ACM during interim storage and in the CAMU.

Once the ACM is moved into the CAMU, I highly recommended that Asarco delineate a portion of the CAMU cell for storage of ACM material only, in accordance with EPA and Montana's Asbestos regulations to include proper signage and recorded location within the cell.

I gave Mr. Nickel a copy of EPA's Guide to Normal Demolition Practices under the Asbestos NESHAP. In addition, I left with him a draft copy of Montana Asbestos Work Practices and Procedures Manual.

Blast Furnace Flue:

Mr. Nickel escorted me to the #1 Blast Furnace Flue, where I took digital photos of the slag tunnel support west wall and flue floor. I observed that the floor of the flue at this location was made of concrete. In fact, it appeared that concrete was used for flue floor behind the entire blast furnace process unit. It is unknown if the Blast Furnace Flue has a concrete floor from the #3 blast furnace slag tunnel support wall west to the Dross Plant. In my discussion with Mr. Nickel, we concluded that the depth of the flue dust in this area is unknown as well. (See photos 001-006 in the attached photolog).

Dross Plant:

Connected to the Blast Furnace, via the Blast Furnace flue, is the Dross Plant. Mr. Nickel and I entered the Speiss (Long) Pit where I took digital photographs of the pit and the Speiss (Short) pit that leads into the Dross Plant. I noted that both pits were constructed of cement and appeared to be cleaned and vacuumed. In addition, I took a photo of the backside of the Reverb Furnace in the Dross Plant. (See photos 007-009 in the attached photolog).

Sinter Plant:

Using Asarco's 2006 Sinter Plant Decontamination and Demolition Site Work Plan as a guide to access how the work was progressing in this area, I observed that the demolition & ACM contractors (Envirocon, Inc. and IRS Environmental) had or was in the process of completing the following tasks as outlined in Section 4.0 of the plan:

- Site mobilization and Set up (Completed)
- Utility Isolation and Protection (Completed)
- Storm Water Protection (Completed)
- Lead Dust Removal and Building Cleaning (On-going)
- ACM Abatement (On-going)
- Demolition (On-going)
- Waste Management (On-going)
- Recycle/Salvage Steel (On-going)

I took digital photographs to substantiate the activities at the Sinter Plant. (See photos 010-015 and 025-034 in the attached photolog).

Bailey Building:

ACM (burrito wrapped material) and ACM in cardboard boxes, from the demolition of the Sinter Plant, are stored on an interim basis in the northwest corner of the Bailey Building. (See photos 016-019 in the attached photolog). In addition, demolition debris from the Sinter Plant is also stored in the southeast corner of the Bailey Building pending disposal into the CAMU. Recyclable scrap metal is being accumulated outside the building on the west side. (See photos 020-024 in the attached photolog).

Consolidated Handling & Storage Building:

Up on the "Track Bin" of the CSHB, Asarco continues to store recyclable material (copper) from the Zinc Plant Holding Furnace. Mr. Nickel asked me if the Department would consider moving the material from the Zinc Plant Holding Furnace, into the CAMU instead of shipping it out for disposal. No samples have been taken of the copper recyclable material for analytical purposes to date.

Next and parallel to the "Track Bin" is the "Truck Bin." Mr. Nickel explained to me that large amounts of demolition debris, destined for the CAMU, can be stored in this bin, on an interim basis, once a ramp has been built to allow trucks and front-end loaders to bring demolition material into the bin. (See photos 035-036 in the attached photolog).

Lead reside dust and other loose material was collected or vacuumed from the Sinter Plant and placed into two different corners of the I-Bin in the CSHB. Most of the lead residue dust and scrapings are captured in large plastic bags used by the vacuum truck. However, there is approximately 10 cubic yards of loose lead residue dust intermixed with the plastic bags. (See photos 038-041 in the attached photolog).

In addition, in the southwest corner of the I-Bin is approximately 30 cubic yards of limerock that still remains from cleaning out the acid tanks in the fall of 2005. The limerock was used to neutralize the acid in the tank sludge. (See photo 037 in the attached photolog). Mr. Nickel asked me if the Department would also consider moving the limerock into the CAMU instead of shipping it out for disposal. No samples have been taken of the limerock for analytical purposes to date.

At some time in the future, the Department may sample the Zinc Plant Holding Furnace material and limerock prior to making a determination if these materials can go into the CAMU.

At the conclusion of the inspection, Mr. Nickel and I reviewed the Asarco/EPA/MDEQ Action items sheet from the meeting on April 25-26, 2006, in his office.

Copies of the digital photographs taken during the inspection are attached to this report and are on file in the Department's Asarco facility folder.

WASTE MINIMIZATION REVIEW: None discussed.

RECOMMENDATIONS: Adhere to Montana's hazardous waste regulations.

5-10-06
Date of Inspection Report

Iver L. Johnson
Hazardous Waste Specialist

MT DEQ P&C DIVISION WUTM BUREAU
Photolog-asarco-15.doc

PHOTO #: ASARCO_06125-001
SUBJECT: Compliance Inspection
LOCATION: East Helena, MT.
COUNTY: Lewis & Clark
DATES: May 5, 2006
WEATHER: Sunny
PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (sig.) Iver L. Johnson
DEQ WITNESS: N/A
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Standing in the Blast Furnace Flue looking west at the bulkhead sealing off the flue from the #1 Blast Furnace to the Dross Plant.

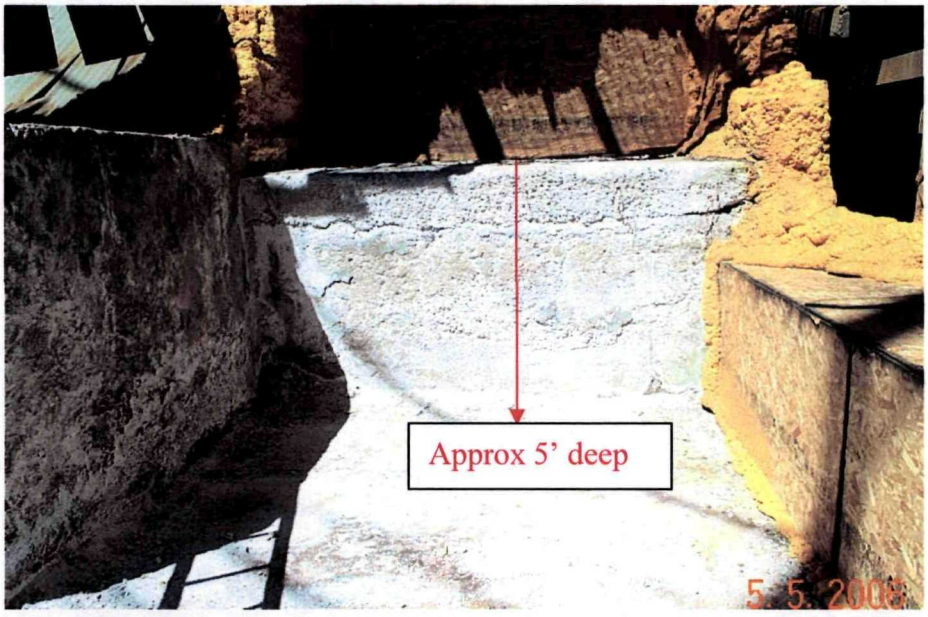
MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-002

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Looking at the eastside concrete wall that supports the roof over the #3 blast furnace slag tunnel.

The depth of the flue dust that was on top of the concrete floor is unknown. However, the distance from the top of roof over the #3 slag tunnel to the floor of the flue was approximately 5 feet.



MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-003

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Standing on the concrete floor in the Blast Furnace Flue behind the #1 Blast Furnace process unit.

It appears that the flue area behind the entire Blast Furnace was built with a concrete floor. However, it is unknown how far the concrete floor extends beyond this area as the flue heads west towards the Dross Plant or east further along the flue itself.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-004

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Standing in the #3 Blast Furnace slag tunnel looking north at the south side and bottom of the Blast Furnace Flue as it passes over the tunnel.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-005

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Standing in the blast furnace flue looking east towards the #3 Blast Furnace west wall that goes over the #3 slag tunnel.

Note the continued deterioration of the flue. The depth of the flue dust is unknown at this location as is the composition of the flue floor.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-006

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Standing in the same location in the flue, as described in the photo above, looking west towards the Dross Plant Vent Duct that leads into the Blast Furnace Flue.

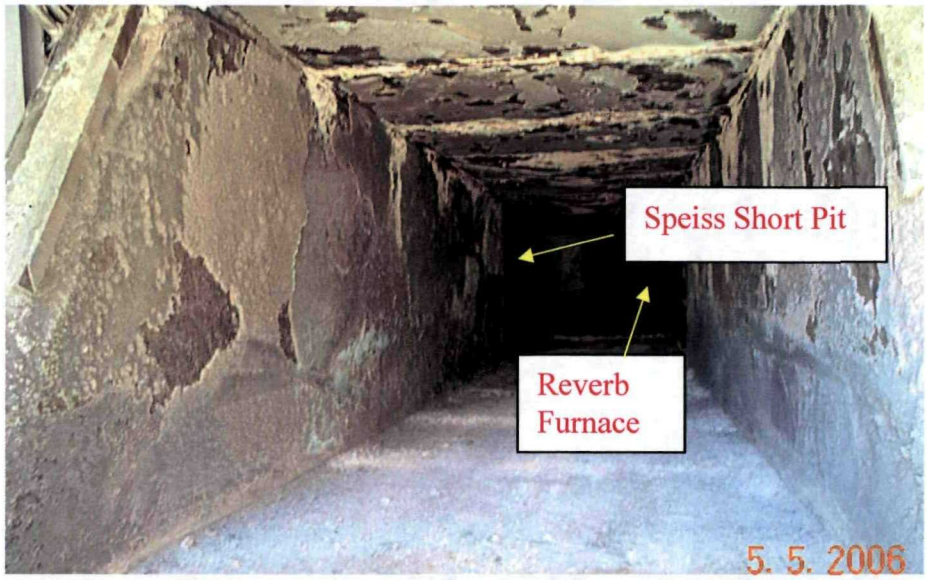
MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-007

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Standing outside the Speiss (Long) Pit that leads into the Dross Plant. At the end of the pit is the opening into the Reverb furnace in the Dross Plant. If one were to take a left turn at the end of this pit, it leads to the Speiss (Short) pit.

Note: The floor and the walls of the Speiss Pits are made of concrete.



MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-008

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Standing at the juncture of the Long and Short Speiss Pit looking into the Spiess (Short) Pit.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-009
PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Close-up of the backside of the Reverb Furnace in the Dross Plant looking from the Speiss Pit.

Note the accumulated lead residue waste that still remains under the furnace to the right of the photo.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-010

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

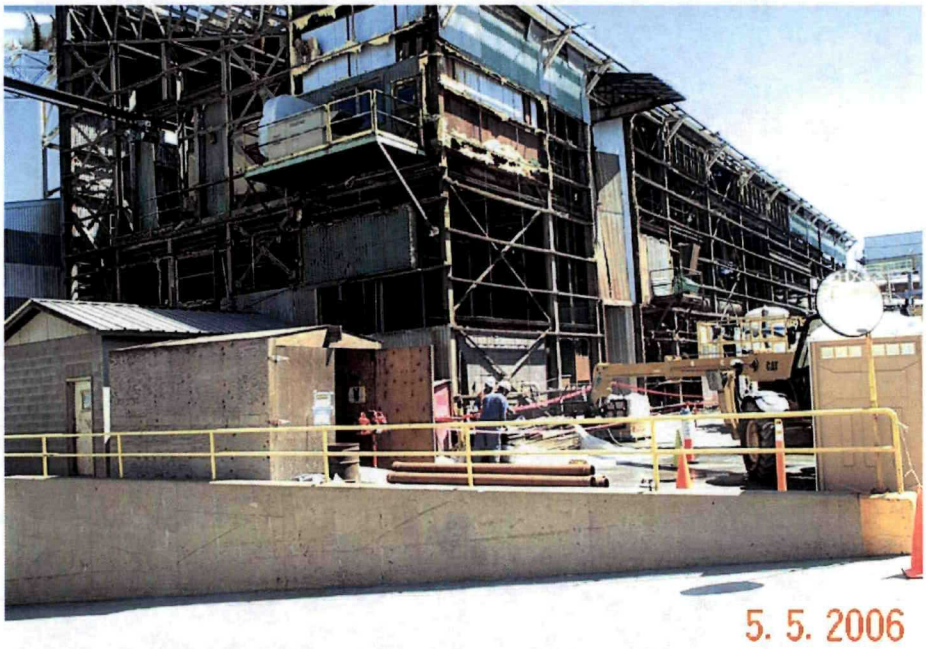
Overall view of the West wall of the Sinter Plant with most of the transit paneling removed. The roof panels are still in place for the most part.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-011

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Overall view of the South wall of the Sinter Plant during demo. The transite siding is collected in the area marked with red tape near the lower center of the photo.



MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-012

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Close-up of the exposed interior South wall of the Sinter Plant taken during demolition.

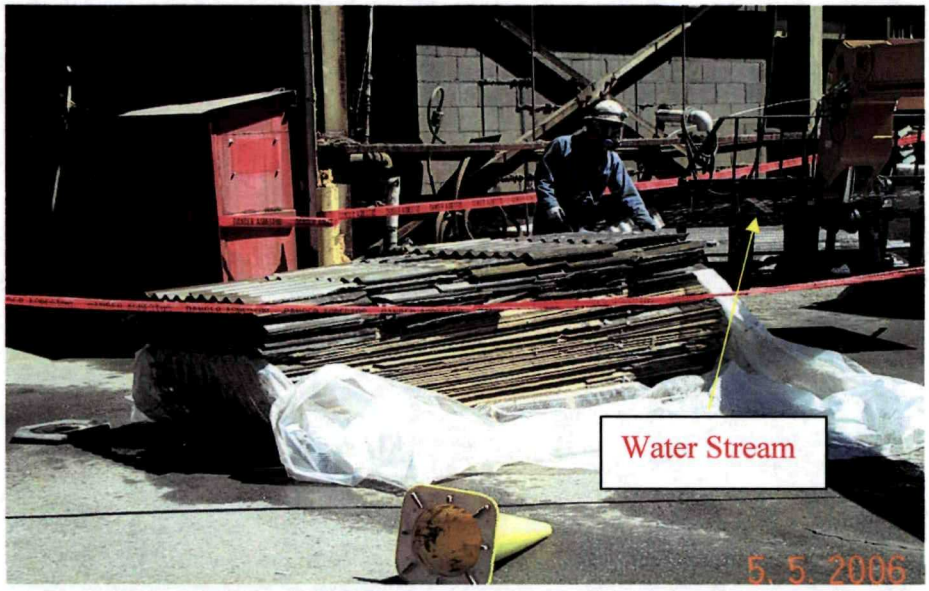
MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-013

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Looking at the area where ACM (Transite siding) is bundled up, wetted down, and "burrito wrapped" at the southwest corner of the Sinter Plant.

Note the stream of water coming in from the right of the photo to suppress ACM emissions.



MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-014

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

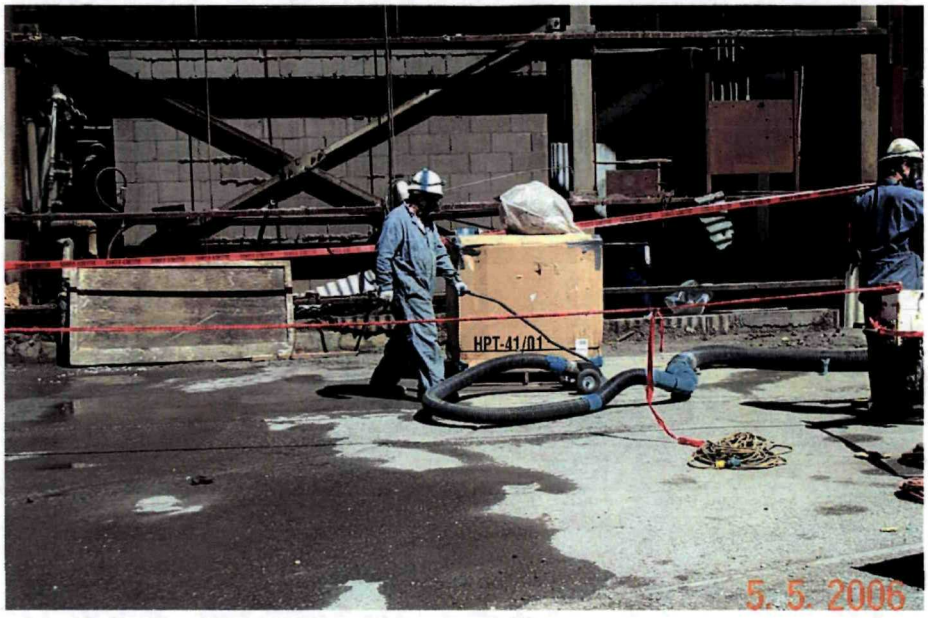
Vacuum trailer used to sweep and vacuum ACM material at the Sinter Plant.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-015

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Close-up of IRS technicians using the vacuum hose to collect loose ACM dust or particles after the bundle was moved to the Bailey building for interim storage.

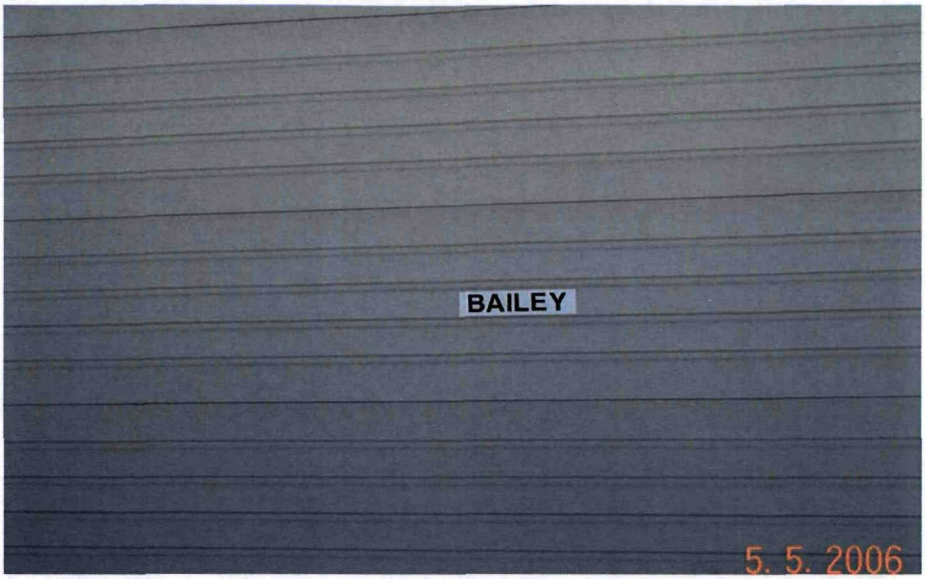


MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-016

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Looking at the overhead door leading in the Coverall building called "Bailey" where the ACM is in interim storage.



MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-017

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

After entering the Bailey building, the Asbestos material is stored in the Northwest corner of the building. The lego blocks are approximately six (6) feet high.

It appeared that proper signage was in use at the time of the inspection.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-018

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Looking at some of the "burrito wrap" ACM in storage in the Bailey building.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-019

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Those small broken pieces of transite ACM paneling are collected in cardboard boxes also stored in the NW corner of the Bailey building.

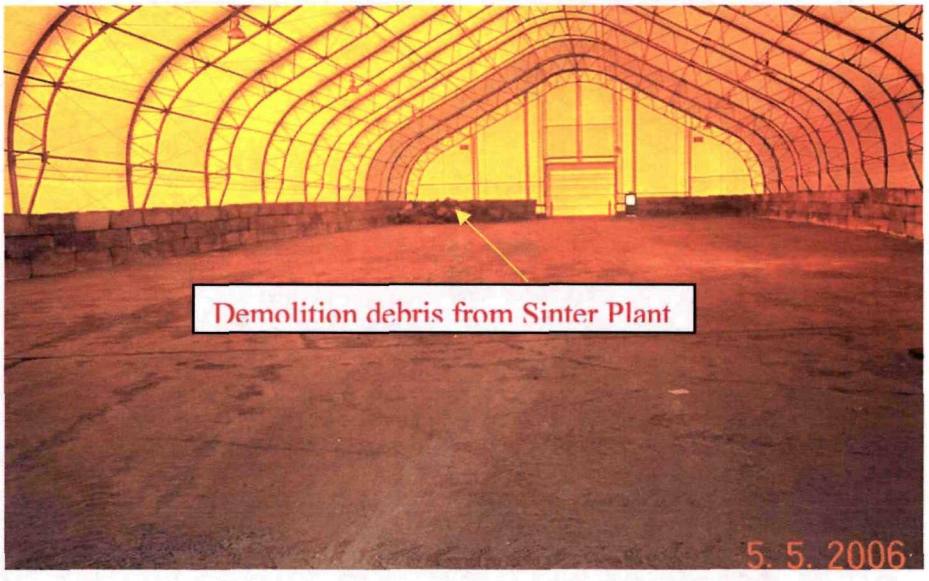
MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-020

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Overall view of the Bailey building taken from the overhead door position. The ACM storage area is to the immediate right of the photo.

More demolition debris from the Sinter Plant is being collected in the far southeast corner of the Bailey building.



MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-021

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Close-up of some of the demolition debris from the Sinter Plant being accumulated in the SE corner of the Bailey building.

Debris consists of wood, some non-recyclable metal, hoses, conveyor belts and non-ACM insulation.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-022

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Another close-up photo of some the Sinter Plant debris being accumulated in the Bailey building.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-023

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Another look of the demolition debris stored in the Bailey building on an interim basis. This type of debris is destined for disposal in the CAMU.

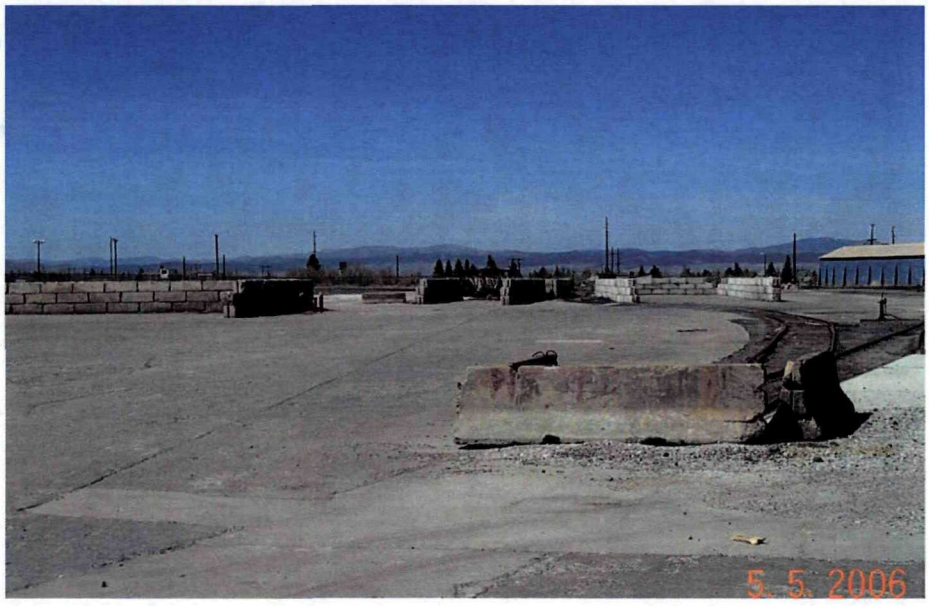
MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-024

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Outside and to the Northwest of the Bailey building is the steel lay-down area. All recyclable scrap steel from all the demo work will be stored at this location prior to loading onto flatbed railcars brought into the plant on the tracks shown in this photo.

Note: Concrete debris from all the demolition activities is going to be stored in the CSHB at the time of this inspection.



MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-025

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.) _____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Photo shows the type of vacuum truck used by demolition contractors to sweep and vacuum lead residue dust from inside ventilation ducts, floors and ledges at the Sinter Plant.

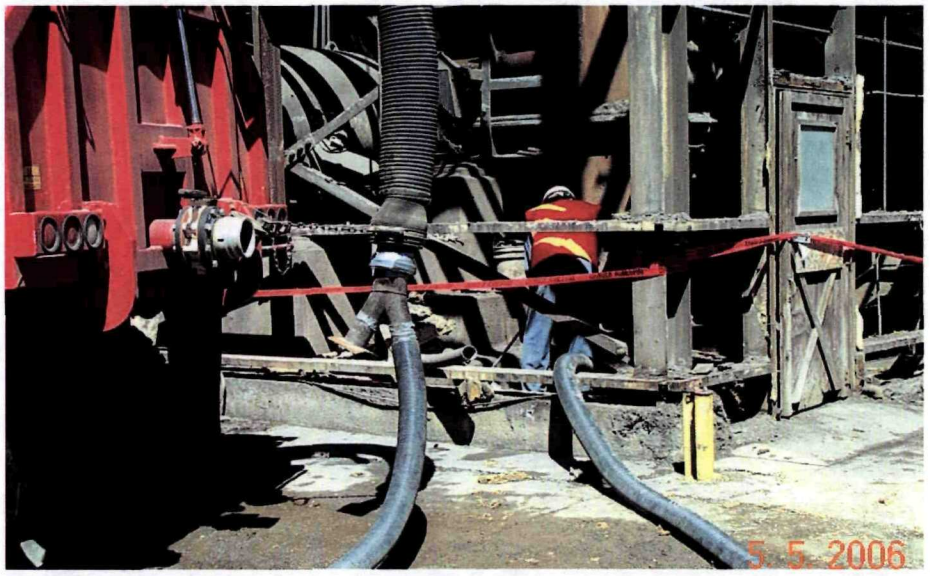
The dust is collected into plastic bags. The bag collection canister is located on the front of the box.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-026

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.) _____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Close-up of contract worker collecting residue and other dust from the floor of the Sinter Plant using the vac truck. The door into the east side of the Sinter Plant is shown in the photo.



MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-027

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.) _____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

This photo shows some of the lead residue remaining on the ledges after the transite siding has been removed at the Sinter Plant east wall.

It appeared that this residue was hard and not prone to be blown away with the wind.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-028

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

This photo gives the viewer an idea how much vent work and remaining transite paneling is on the east side of the Sinter Plant at the time of the inspection.

It appears that most of the vent work and interior framework demolition will begin at the east end of the building.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-029

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

This photo shows some of the remaining duct work on the east side of the Sinter Plant that needs to be dismantled before the building comes down.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-030

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

After small adjacent buildings to the Sinter Plant have been demolished the foundation and footings remain.

According to Asarco personnel another contract will have to be put into place to remove this type of obstructions in order to place a cap over the entire footprint once all the buildings are removed.

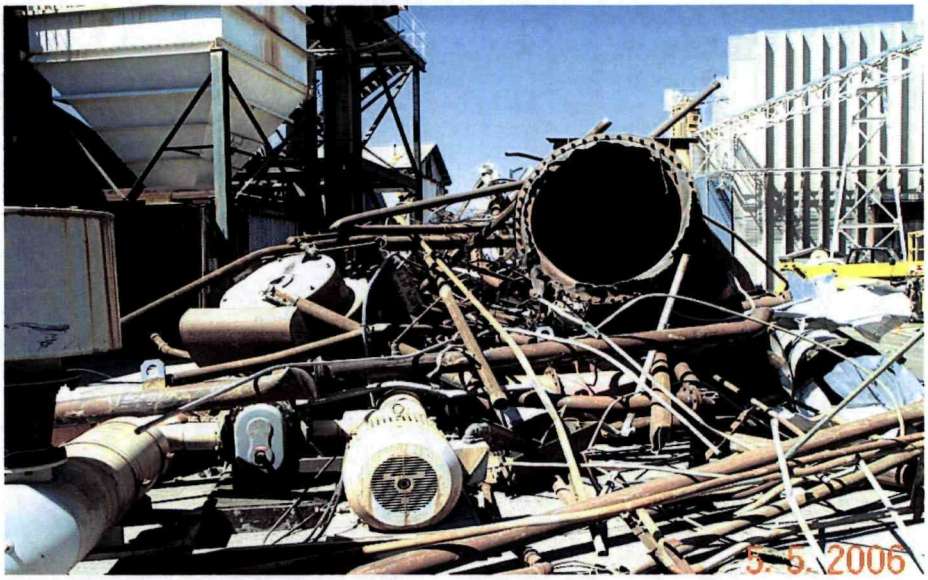
The current contract does not call for removal of this type of debris.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-031

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

This pile of scrap metal from the Sinter Plant is destined for recycling and represents some of the type of metal going out on flatbed railcars in the future.

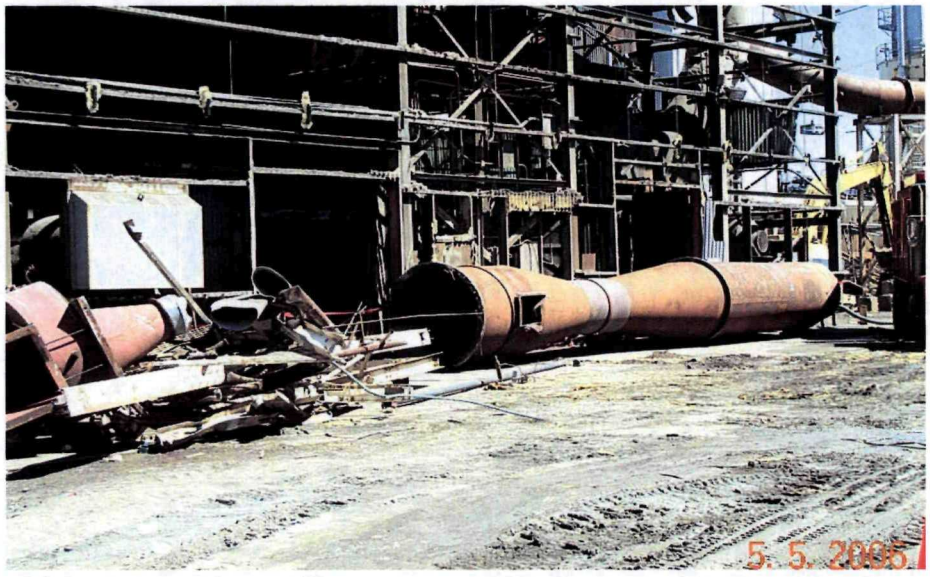


MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-032

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Another view of scrap metal removed from the Sinter Plant.



MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-033

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Upon closer look into the ventilation ductwork, I observed lead residue that was in the bottom of this particular duct.

I was assured by Asarco and Envirocon personnel that this type of waste would be vacuumed up prior to placement in the scrap metal lay-down area northwest of the Bailey building.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-034

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

This photo shows an area south of the Sinter Plant used to wash the interior of small duct work and piping with water. The water/residue mix is captured via the vac truck as it leaves the duct or pipe and stored in plastic bags.

The moist area, seen here in this photo, was a dust control event that occurred during the inspection.

MT DEQ WUTM BUREAU

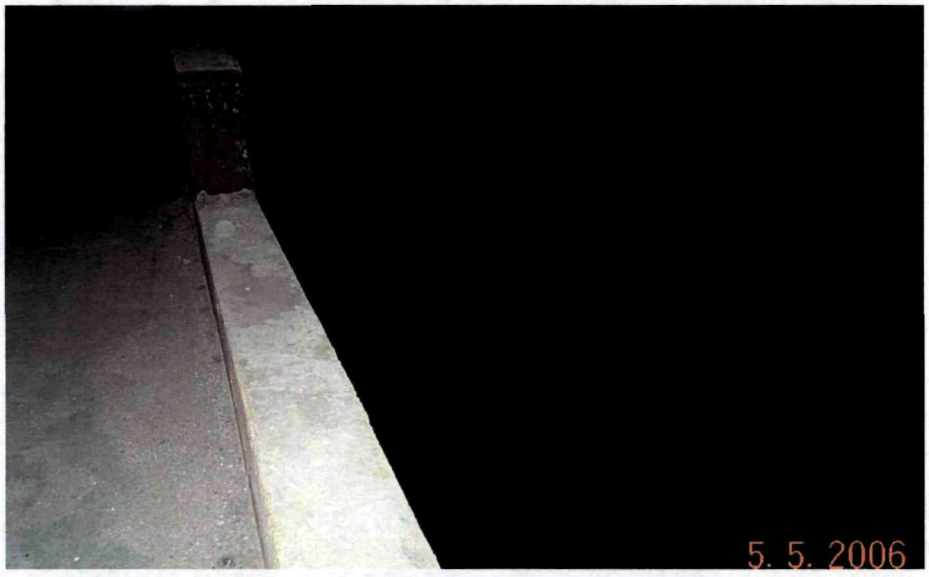
PHOTO #: ASARCO_06125-035

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Inside the Consolidated Storage and Handling Building (CSHB) is a Truck Bin, which runs parallel with the Track bin. Photo is looking west from the top of the Track bin.

The Truck bin is approximately 30-35 feet deep and approx. 25 feet across.

It has been suggested that Asarco use this Truck bin to store waste destined for the CAMU along with the Track bin and I-Bin in the CSHB.



MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-036

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Another view of the Truck Bin looking east. The concrete wall to the right center of the photo will be demolished to allow trucks to dump CAMU material into the bin after building a ramp leading down onto the floor of the bin.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-037

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

This photo shows limerock, used to soak up Acid Plant sludge from the acid tanks, currently stored in the southwest corner of the I-Bin.

Asarco personnel asked the Department to consider placing this material into the CAMU.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-038

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Close-up of the plastic bags containing lead residue vacuumed up at the Sinter Plant using the red Vac truck.

The waste is stored in the southeast corner of the I-Bin in the CSHB.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-039

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

Another view of the bags and loose residue collected via the Vac truck at the Sinter Plant and stored in the I-Bin of the CSHB.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-040

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

One more photo of the bags and loose material from the Sinter Plant.

Approx. 35 yards of the waste was in accumulation at the time of the inspection.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-041

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

In the northeast corner of the I-Bin in the CSHB, another pile of lead residue waste was observed during the inspection.

It should be mentioned here that all the waste material in the CSHB is destined for disposal either in the CAMU or at a TSDF.

MT DEQ WUTM BUREAU

PHOTO #: ASARCO_06125-042

PHOTOGRAPHER: Iver L. Johnson
PHOTOGRAPHER (int.)_____
CAMERA: Kodak DC5000 Zoom Digital Camera
FILM TYPE: N/A
NEGATIVE LOCATION: N/A
EXPLANATION:

This photo shows an overall view of the tracks, loading deck, storm water tank and Dross plant in the background.

According to Asarco personnel, all this will be demolished and leveled by the end of 2006 if all goes well.